

Monica J. Tranel
TRANEL LAW FIRM, P.C.
401 Washington Street
Missoula, MT 59802
(406) 926-2662
mtranel@tranelfirm.com

Attorneys for Plaintiffs Susan Webber and Jonathan St. Goddard

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
GREAT FALLS DIVISION**

Susan Webber and Jonathan St. Goddard, Plaintiffs, vs. U.S. DEPARTMENT OF HOMELAND SECURITY, THE UNITED STATES OF AMERICA, and, in her official capacity, KRISTI NOEM, Defendants.	Cause No. 4:25-cv-00026-JTJ MOTION FOR PRELIMINARY AND PERMANENT INJUNCTION HEARING RESPECTFULLY REQUESTED
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**MOTION FOR
PRELIMINARY AND PERMANENT INJUNCTION**

Pursuant to F.R.Civ.Pro. 65(a) Plaintiffs Susan Webber and Jonathan St. Goddard ask the Court to enjoin: Sections 2(a), (b), (d), (f), (g), and (h) of Executive Order 14193 as amended; Section 14 of Proclamations 10896 and 10895; and, Sections 2, 3(a), (b), (c), (d), (e) and (f), Section 4 (a), (b), (c), and (d) of Executive Order on Reciprocal Tariffs issued April 2, 2025. The Orders are collectively referred to as the Canada Orders. The Canada Orders are invalid in their entirety, and this Court should enjoin them until such time as the Court can hold a hearing and consider the merits of the argument. This relief is requested due to the irreparable harm that the Plaintiffs are suffering and will continue to suffer as a result of the Orders.

The grounds for this motion are set forth in the attached brief, and its supporting declarations. Counsel has contacted the United States Attorney's office in Billings regarding this filing and copies are being mailed and emailed to that office.

A hearing is respectfully requested at the Court's soonest convenience.

DATED this 4th day of April, 2025.

TRANEL LAW FIRM P.C.

Monica J. Tranel
Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of April, 2025, I served true and accurate copies of the **PLAINTIFFS' OF MOTION FOR INJUNCTION AND IMMEDIATE HEARING** by the method(s) indicated below, addressed as follows:

1 - 2 U.S. Mail, Postage Prepaid
_____ Federal Express, Billed to Sender
_____ Hand Delivery
_____ E-Mail

Kurt Alme
District of Montana
Billings Main Office
2601 2nd Ave N.
Suite 3200
Billings, MT 59101

Regulatory Affairs Law Division
Office of the General Counsel
U.S. Department of Homeland Security
245 Murray Lane, SWMail Stop 0485
Washington, DC 20528-0485

Pursuant to F.R.C.P. 5 and L.R. 7.1, the United States Attorney for Montana was contacted regarding this motion and brief through email and telephone at the U.S. Attorney's office in Billings, Montana, at 406-576-1013, and via email at lindsey.crowder@usdoj.gov. The motion and brief are being served by U.S. Mail overnight delivery requested, and via email. Counsel left a telephone message at 3:30 p.m. on April 4, 2025 with the main office at the U.S. Attorney's office in Billings, MT, with notice of the filing.